IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NOHORA SCHEPER	*	
Plaintiff,	*	**NOTICE OF REMOVAL FROM THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MD CASE NO. 404488-V**
vs.	*	
SHOPPERS FOOD WAREHOUSE CORP.	*	**CIVIL ACTION NO. _____**
Defendant.	*	

PETITION FOR REMOVAL

Pursuant to 28 U.S.C., Section 1441(a), the Defendant, Shoppers Food Warehouse Corp., respectively notices the removal of the above-captioned matter to this Honorable Court from the Circuit Court for Montgomery County, Maryland, and as grounds therefor states as follows:

1. On or about May 8, 2015, Defendant Shoppers Food Warehouse Corp. was served with a Summons and Complaint in an action commenced by the Plaintiff, Nohora Scheper, in the Circuit Court for Montgomery County, Maryland as Docket No. 404488-V. True and correct copies of the Summons and Complaint are attached hereto as Exhibit A. No further proceedings have taken place in this action.

2. This Notice of Removal is filed within thirty (30) days of receipt of service by Defendant Shoppers Food Warehouse Corp. and, therefore, is timely filed pursuant to 28 U.S.C., Section 1446(b).

3. Pursuant to the Federal Rules of Civil Procedure, the Petitioner filed a written Answer to Plaintiff's Complaint on June 5, 2105. Copies of Defendant's Answer and Notice of Removal are attached hereto and incorporated herein by reference as Exhibit B.

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4. In her Complaint, Plaintiff Nohora Scheper seeks judgment against this Defendant in an amount in excess of Seventy-five Thousand Dollars ($75,000) in compensatory damages, plus interest and costs.

5. At the time of commencement of this action, Plaintiff was and is now a resident of the State of Maryland.

6. At the time of commencement of this action, and at all other times relevant to the subject proceeding, Defendant Shoppers Food Warehouse Corp.'s principal place of business is Minnesota, and is incorporated in the state of Ohio.

7. As this is a civil action wherein the amount in controversy exceeds $75,000, exclusive of interest and costs, this Honorable Court has diversity of jurisdiction over this matter pursuant to 28 U.S.C., Section 1332.

8. The Petitioner presents and files herewith a check in the amount of $400 for the filing fee, as required by law.

WHEREFORE, the Defendant, Shoppers Food Warehouse Corp., respectfully requests to remove this action from the Circuit Court for Montgomery County, Maryland to the United States District Court for the District of Maryland.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of June, 2015, a copy of the foregoing Petition for Removal was forwarded, postage prepaid, via First Class mail, to:

Robert J. Goldman
Goldman Law Firm, PC
3919 National Drive, Suite 110
Burtonsville, Maryland 20866
Counsel for Plaintiff

Christopher R. Dunn, #05278
Counsel for Defendant

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